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Attorneys for Solar Universe, Inc.

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

In re:

JERSEY ELECTRIC & SOLAR,

Debtor.

Chapter 11

Case No.: 15-14394-LED

RESERVATION OF RIGHTS

Date: August 4, 2015
Time: 2:00 p.m.

Solar Universe, Inc. reserves its rights with respect to the following “first day”
motions pending a final hearing:

- Motion for Entry of Order: (I) Authorizing Debtor to Pay Wages, Salaries, Benefits, Reimbursable Business Expenses, and Other Employee Obligations; and (II) Authorizing and Directing Financial Institutions to Honor and Process Checks and Transfers Related to such Obligations [DE 8]

Based upon Debtor’s schedules, Solar Universe, Inc. appears to be Debtor’s largest unsecured creditor and the target of this chapter 11 case. As an unsecured creditor, Solar Universe, Inc. would respectfully request that no emergency, interim relief be afforded Debtor’s owner and insider - Brian N. Geczi – particularly with respect to undisclosed, potentially unlimited expense reimbursements, pending disclosure of all proposed payments to insiders and consideration at the final hearing.

- Motion for Entry of Order Determining that Adequate Assurance Has Been Provided to Utility Companies and Establishing Procedures for Determining Requests of Additional Adequate Assurance [DE 11]
- Motion for Entry of Order Authorizing Maintenance of Existing Bank Accounts and Related Relief [DE 14]

Solar Universe, Inc. further notes Debtor has grossly mischaracterized the facts concerning the parties' disputes, but that issue is not before the Court in the context of these "first day" motions.

DATED August 3, 2015.

LEWIS ROCA ROTHGERBER LLP

By: s/ Robert M. Charles, Jr.
Robert M. Charles, Jr.
Daniel Kiefer
Attorneys for Solar Universe, Inc.

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

**LEWIS ROCA
|
ROTHGERBER**

CERTIFICATE OF SERVICE

1. On August 3, 2015, I served the following documents:

RESERVATION OF RIGHTS

2. I served the above-named document by the following means to the persons as listed below:
(Check all that apply)

☒ **a. ECF System** (You must attach the "Notice of Electronic Filing", or list all persons and addresses and attach additional paper if necessary)

RYAN A. ANDERSEN randers@andersenlawlv.com

Attorney for Debtor

U.S. TRUSTEE – LV- 11 USTPRegion17.lv.ecf@usdoj.gov

☐ **b. United States mail, postage fully prepaid**
(List persons and addresses. Attach additional paper if necessary)

☐ **c. Personal Service** (List persons and addresses. Attach additional paper if necessary)

I personally delivered the document(s) to the persons at these addresses:

☐ For a party represented by an attorney, delivery was made by handing the document(s) to the attorney or by leaving the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

☐ For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place or abode with someone of suitable age and discretion residing there.

☐ **d. By direct email (as opposed to through the ECF System)**

(List persons and email addresses. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

☐ **e. By fax transmission** (List persons and fax numbers. Attach additional paper if necessary)

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

☐ **f. By messenger** (List persons and addresses. Attach additional paper if necessary)

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service. (A declaration by the messenger must be attached to this Certificate of Service).

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

LEWIS ROCA
ROTHGERBER

I declare under penalty of perjury that the foregoing is true and correct.

Signed on August 3, 2015

Renee L. Creswell
(NAME OF DECLARANT)

Renee L. Creswell
(SIGNATURE OF DECLARANT)

3993 Howard Hughes Pkwy, Suite 600
Las Vegas, NV 89169-5996

**LEWIS ROCA
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